

Exhibit A-1



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 449422

April 25, 2022

LEGAL SERVICES RENDERED through March 31, 2022

Re: ads. Elliot McGucken

[REDACTED]
[REDACTED]
[REDACTED]

TOTAL DUE:



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 449422

April 25, 2022
Page 2

ads. Elliot McGucken

Fees through March 31, 2022:

[REDACTED]			[REDACTED]	[REDACTED]
03/22/22	Review and revise extension letter; draft note to opposing counsel regarding same.	E LACKMAN	0.40	230.00
03/24/22	Review and comment on draft of McGucken answer.	E LACKMAN	0.70	402.50
[REDACTED]			[REDACTED]	[REDACTED]
03/28/22	Review updated answer and defenses; revise same; draft comments for further editing.	E LACKMAN	0.20	115.00
[REDACTED]			[REDACTED]	[REDACTED]
03/29/22	Review ruling; draft overview and instructions for preparation of court submissions.	E LACKMAN	0.30	172.50
[REDACTED]			[REDACTED]	[REDACTED]



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 449422

April 25, 2022
Page 3

03/30/22	Review court rules, advise on approach to submissions due to court; draft points for same.	E LACKMAN	1.10	632.50
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/31/22	Review and revise joint letter; draft note to A. Raff regarding contents of same; review and respond to plaintiff's letter.	E LACKMAN	2.10	1,207.50

Total Fees:

[REDACTED]

Billing Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
E LACKMAN	[REDACTED] hours at \$575.00 =		[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 449422

April 25, 2022

REMITTANCE
(please include with payment)

Current Fees:

Current Disbursements:

Total Current Charges - This Invoice:

[REDACTED]
[REDACTED]
[REDACTED]

Please remit to:

Mitchell Silberberg & Knupp LLP
2049 Century Park East, 18th Floor
Los Angeles, CA 90067

Wire/ACH Transfer Instructions:

Routing Number or ABA: 121000248
Bank Name: Wells Fargo Bank, N.A.
Bank Address: 420 Montgomery, San Francisco, CA 94104
Beneficiary Account No.: 4159349430
Beneficiary Account Name: Mitchell Silberberg & Knupp LLP
For International Transfers for payments in USD: Swift BIC WFBIUS6S
For International Transfers for payments in currencies other than USD: Swift BIC WFBIUS6WFFX
For payment inquiries please e-mail payment@msk.com

*** Please Include Invoice Number with Payment ***

Note that MSK will not change its banking information without prior notice on our bills. All MSK emails originate from a [3 initials]@msk.com address. Phishing and fraud attempts are common, especially those requesting that you send payment to a new account that does not match our bills. Please don't hesitate to call if you ever have any doubt about the authenticity of any communication.



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 450543

May 18, 2022

LEGAL SERVICES RENDERED through April 30, 2022

Re: ads. Elliot McGucken

[REDACTED]
[REDACTED]
[REDACTED]

Total - current charges:



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 450543

May 18, 2022

ads. Elliot McGucken

Fees through April 30, 2022:

04/07/22	Participate in court conference.	E LACKMAN	1.00	575.00
04/10/22	Draft report and recommendations to client pertaining to court conference.	E LACKMAN	0.40	230.00
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
04/18/22	Review and revise initial disclosures (0.6).	E LACKMAN	0.60	345.00
04/20/22	Review client comments on initial disclosures.	E LACKMAN	0.10	57.50
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
04/21/22	Revise interrogatories.	E LACKMAN	0.60	345.00



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 450543

May 18, 2022

[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
04/25/22	Review and revise document requests to McGucken.	E LACKMAN	0.70	402.50
04/26/22	Review and revise document requests to McGucken.	E LACKMAN	0.30	172.50
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
Total Fees:				[REDACTED]

Billing Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
E LACKMAN	[REDACTED] hours at \$575.00 =		[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]		[REDACTED]



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 450543

May 18, 2022

REMITTANCE
(please include with payment)

Total Current Charges - This Invoice:



Please remit to:

Mitchell Silberberg & Knupp LLP
2049 Century Park East, 18th Floor
Los Angeles, CA 90067

Wire/ACH Transfer Instructions:

Routing Number or ABA: 121000248
Bank Name: Wells Fargo Bank, N.A.
Bank Address: 420 Montgomery, San Francisco, CA 94104
Beneficiary Account No.: 4159349430
Beneficiary Account Name: Mitchell Silberberg & Knupp LLP
For International Transfers for payments in USD: Swift BIC WFBIUS6S
For International Transfers for payments in currencies other than USD: Swift BIC WFBIUS6WFFX
For payment inquiries please e-mail payment@msk.com

*** Please Include Invoice Number with Payment ***

Note that MSK will not change its banking information without prior notice on our bills. All MSK emails originate from a [3 initials]@msk.com address. Phishing and fraud attempts are common, especially those requesting that you send payment to a new account that does not match our bills. Please don't hesitate to call if you ever have any doubt about the authenticity of any communication.



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 452547

June 29, 2022

LEGAL SERVICES RENDERED through May 31, 2022

Re: ads. Elliot McGucken

[REDACTED]
[REDACTED]
[REDACTED]

TOTAL DUE:



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 452547

June 29, 2022
Page 2

ads. Elliot McGucken

Fees through May 31, 2022:

05/04/22	Review amended complaint redline and correspondence with client regarding same.	E LACKMAN	0.40	206.00
05/05/22	Team meeting regarding response to amended complaint.	E LACKMAN	0.50	257.50
05/05/22	Review case management order, case history to evaluate appropriateness and timeliness of Plaintiff's filing of the First Amended Complaint; review rules from Judge Woods, review discovery served, and provide analysis as to next steps.	E. NGUYEN	0.80	220.00
05/05/22	Meeting with Eleanor Lackman and Caen Dennis regarding amended complaint, legal issues, and strategy.	E. NGUYEN	0.50	137.50
05/09/22	Review protective order; follow up with client regarding [REDACTED].	E LACKMAN	0.40	206.00
05/09/22	Legal research for draft Rule 11 letter to counsel for McGucken.	E. NGUYEN	0.50	137.50
05/10/22	Review and comment on Rule 11 letter.	E LACKMAN	0.20	103.00
05/10/22	Draft and revise Rule 11 letter regarding Amended Complaint.	E. NGUYEN	2.30	632.50



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 452547

June 29, 2022
Page 3

05/10/22	Coordinate with Maria Paulucci regarding images in the Amended Complaint compared to images in the original Complaint Comparison in connection with Rule 11 letter.	E. NGUYEN	0.10	27.50
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
05/11/22	Review and advise on protective order (0.2); review and revise answer to amended complaint (0.3); review and revise Rule 11 letter (0.4); review and revise proposed protective order and cover letter (0.3).	E LACKMAN	1.20	618.00
05/11/22	Pull Otto v. Hearst docket and protective order, review, draft and revise protective Order pursuant to Judge Woods' individual rules.	E. NGUYEN	1.30	357.50
05/11/22	Email to Andrew Raff with Draft Answer and Rule 11 letter for review.	E. NGUYEN	0.10	27.50
05/11/22	Draft and revise protective order and review Judge Woods' rules regarding the same.	E. NGUYEN	0.20	55.00
05/11/22	Emails with Eleanor Lackman and edits to Rule 11 letter.	E. NGUYEN	0.20	55.00
05/11/22	Draft and revise Rule 11 letter to counsel for McGucken.	E. NGUYEN	0.20	55.00
05/12/22	Email to counsel with proposed Protective Order; draft and revise cover letter to the Judge for the same.	E. NGUYEN	0.30	82.50



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 452547

June 29, 2022
Page 4

05/13/22	Finalize and arrange for filing of Amended Answer.	E. NGUYEN	0.20	55.00
05/16/22	Revise Rule 11 letter.	E LACKMAN	0.60	309.00
05/16/22	Draft and revise Rule 11 letter to Burroughs to incorporate updates and comments from Andrew.	E. NGUYEN	0.20	55.00
05/17/22	Email to Andrew Raff seeking clarification on the images references in McGucken's complaint.	E. NGUYEN	0.10	27.50
05/17/22	Coordinate with Maria Paulucci the filing of cover letter and proposed protective order.	E. NGUYEN	0.20	55.00
05/17/22	Email response to Andrew Raff and finalize Rule 11 letter; serve.	E. NGUYEN	0.30	82.50
05/18/22	Emails and review order from Court regarding proposed protective order.	E. NGUYEN	0.10	27.50
05/24/22	Determine deadline for Shutterstock's responses to McGucken's first set of discovery requests (0.1); prepare initial draft of Shutterstock's Responses and Objections to Plaintiff McGucken's First Set of Requests for the Production of Documents (4.0); prepare initial draft of Objections and Answers to Plaintiff McGucken's First Set of Requests For Admission (0.5); and prepare initial draft of Objections and Answers to Plaintiff McGucken's First Set of Interrogatories (0.8).	S. FRANKEL	5.40	1,485.00



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 452547

June 29, 2022
 Page 5

05/25/22	Review new discovery requests and draft comments regarding approach to response.	E LACKMAN	0.70	360.50
05/25/22	Compile list of questions for E. Lackman and A. Raff concerning Shutterstock's responses to McGucken first set of discovery requests.	S. FRANKEL	0.70	192.50
05/26/22	Review chart of discovery requests and proposed responses, and revise same and provide notes (1.5).	E LACKMAN	1.50	772.50
05/26/22	Prepare chart outlining Shutterstock's objections and responses/answers to McGucken's First Set of Requests for the Production of Documents, First Set of Requests For Admission, and First Set of Interrogatories (3.5); and email same to E. Lackman for review and comment (0.1).	S. FRANKEL	3.60	990.00
05/27/22	Draft and revise proposed Protective Order.	E. NGUYEN	0.20	55.00
05/27/22	Review and revise discovery response chart and incorporate comments from E. Lackman (1.2); email same to A. Raff for review and comment (0.1).	S. FRANKEL	1.30	357.50
05/31/22	Review and revise submissions for protective order.	E LACKMAN	0.20	103.00
05/31/22	Email to opposing counsel with revised draft proposed protective order.	E. NGUYEN	0.10	27.50



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 452547

June 29, 2022
 Page 6

05/31/22	Draft and revise proposed Protective Order and draft cover letter per Judge's request for specification in defining "Highly Confidential - AEO" designation.	E. NGUYEN	0.50	137.50
----------	--	-----------	------	--------

Total Fees:

Billing Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
E LACKMAN	[REDACTED]	hours at \$515.00 =	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	
E. NGUYEN	[REDACTED]	hours at \$275.00 =	
S. FRANKEL	[REDACTED]	hours at \$275.00 =	
[REDACTED]	[REDACTED]		



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 452547

June 29, 2022

REMITTANCE
(please include with payment)

Current Fees:

Current Disbursements:

Total Current Charges - This Invoice:



Please remit to:

Mitchell Silberberg & Knupp LLP
2049 Century Park East, 18th Floor
Los Angeles, CA 90067

Wire/ACH Transfer Instructions:

Routing Number or ABA: 121000248
Bank Name: Wells Fargo Bank, N.A.
Bank Address: 420 Montgomery, San Francisco, CA 94104
Beneficiary Account No.: 4159349430
Beneficiary Account Name: Mitchell Silberberg & Knupp LLP
For International Transfers for payments in USD: Swift BIC WFBIUS6S
For International Transfers for payments in currencies other than USD: Swift BIC WFBIUS6WFFX
For payment inquiries please e-mail payment@msk.com

*** Please Include Invoice Number with Payment ***

Note that MSK will not change its banking information without prior notice on our bills. All MSK emails originate from a [3 initials]@msk.com address. Phishing and fraud attempts are common, especially those requesting that you send payment to a new account that does not match our bills. Please don't hesitate to call if you ever have any doubt about the authenticity of any communication.



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 453657

July 22, 2022

LEGAL SERVICES RENDERED through June 30, 2022

Re: ads. Elliot McGucken

[REDACTED]
[REDACTED]
[REDACTED]

Total - current charges:



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 453657

July 22, 2022
 Page 2

ads. Elliot McGucken

Fees through June 30, 2022:

06/01/22	Review and revise draft responses to document demands, interrogatories, and requests for admission drafted by Samantha Frankel.	E. NGUYEN	1.10	302.50
06/01/22	Finish drafting Shutterstock's Responses and Objections to Plaintiff McGucken's First Set of Requests for the Production of Documents (RFP Nos. 52-65) (1.4); finish drafting Objections and Answers to Plaintiff McGucken's First Set of Requests For Admission (RFA Nos. 24-32) (0.3); and finish drafting Objections and Answers to Plaintiff McGucken's First Set of Interrogatories (ROG Nos. 1-2 & 6-10) (0.5).	S. FRANKEL	2.20	605.00
06/02/22	Review E. Nguyen's comments and revisions to Shutterstock's Responses and Objections to McGucken's First Set of Requests for the Production of Documents, Requests For Admission, and Interrogatories, and revise same to incorporate revisions (2.0); email to A. Raff enclosing same for review and comment (0.1).	S. FRANKEL	2.10	577.50



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 453657

July 22, 2022
 Page 3

06/06/22	Review client comments on certain RFP, interrogatory, and RFA answers and revise same accordingly (2.1); correspondence with client regarding strategy on certain interrogatories and RFAs (0.6).	E LACKMAN	2.70	1,390.50
06/06/22	Update verification page for Interrogatories.	E. NGUYEN	0.10	27.50
06/06/22	Follow-up email to counsel regarding proposed protective order; emails and correspondence with opposing counsel regarding trier proposed changes.	E. NGUYEN	0.30	82.50
06/06/22	Review A. Raff's comments and feedback on the draft responses to McGucken's discovery requests (0.2).	S. FRANKEL	0.20	55.00
06/07/22	Review and revise RFPs, ROGs, and RFAs based on questions posed by Samantha Frankel.	E. NGUYEN	0.40	110.00
06/07/22	Email to Shutterstock regarding verification page for Interrogatories.	E. NGUYEN	0.10	27.50
06/07/22	Review and revise Shutterstock's responses to McGucken's First Set of Requests for Production, First Set of Interrogatories, and First Set of Requests for Admissions, and incorporate comments and feedback from A. Raff.	S. FRANKEL	3.70	1,017.50



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 453657

July 22, 2022
 Page 4

06/08/22	Review Shutterstock's First Set of Requests for Production and Interrogatories to McGucken to determine whether we asked for all documentation regarding McGucken's own posting of his images on Flickr, Wikimedia Commons, or any other third-party site, as well as all documents indicating any license terms offered to any licensee with respect to the images at issue either on those sites or on his own site (0.5); email to E. Lackman regarding same (0.1). Prepare initial draft of Shutterstock's Second Set of Requests for Production to McGucken, and email to E. Lackman enclosing same for review and comment (0.5). Prepare chart detailing McGucken's responses to Shutterstock's first set of discovery demands (1.3).	S. FRANKEL	2.40	660.00
06/09/22	Review and supplement second set of RFPs.	E LACKMAN	0.50	257.50
06/10/22	Research for sites controlled by McGucken and any third-party sites to which McGucken supplied his images, and compile list of URLs to same, and work with IT to prepare captures of sites and any metadata (1.2). Review and finalize Shutterstock's Second Set of Requests for Production (0.5); email to opposing counsel enclosing same (0.1).	S. FRANKEL	1.80	495.00



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 453657

July 22, 2022
Page 5

06/12/22	Update note to file to reflect feedback from A. Raff regarding what documents and information Shutterstock can produce in response to certain discovery requests.	S. FRANKEL	0.40	110.00
06/15/22	Draft and revise email to Eleanor Lackman with proposed revisions to changes to proposed protective order by opposing counsel.	E. NGUYEN	0.30	82.50
06/17/22	Review and comment on proposed resolution for protective order issue.	E LACKMAN	0.10	51.50
06/21/22	Email to opposing counsel regarding revised proposed protective order.	E. NGUYEN	0.10	27.50
06/27/22	Meeting with E. Nguyen and S. Frankel regarding status of discovery, plans for collection, follow up on protective order request for court, deposition scheduling (1.0); review and comment on incoming additional requests and deficiency letter.	E LACKMAN	1.30	669.50
06/27/22	Email to opposing counsel regarding proposed protective order.	E. NGUYEN	0.10	27.50
06/27/22	Review and annotate meet and confer/deficiency letter from McGucken on RFPs and Interrogatories.	E. NGUYEN	0.80	220.00
06/27/22	Meeting with Eleanor Lackman and Samantha Frankel regarding upcoming deadlines and next steps.	E. NGUYEN	0.50	137.50
06/27/22	Meeting with E. Lackman and E. Nguyen to discuss status of case and discovery matters (0.5).	S. FRANKEL	0.50	137.50



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 453657

July 22, 2022
 Page 6

06/28/22	Meeting with Sam Frankel regarding next production and tasks.	E. NGUYEN	0.80	220.00
06/28/22	Finalize and file revised protective order with cover letter.	E. NGUYEN	0.20	55.00
06/29/22	Prepare chart of deficiencies and proposed responses in advance of meet and confer.	E. NGUYEN	1.80	495.00
06/29/22	Review court order on protective order, revise filings and refile.	E. NGUYEN	0.20	55.00
06/29/22	Draft and revise deposition notice for McGucken.	E. NGUYEN	0.20	55.00
06/29/22	Compiled and organized terms of service in preparation for bates-stamping of same for production in response to McGucken's First Set of Requests for Production (0.4).	S. FRANKEL	0.40	110.00
06/30/22	Review document production and provide additional suggestions regarding same (1.2); review deficiency chart and draft comments for meet and confer (2.8).	E LACKMAN	4.00	2,060.00

[REDACTED]



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 453657

July 22, 2022
 Page 7

06/30/22	Finalize Shutterstock's Notice of Deposition of Elliot McGucken (0.2); and serve same on opposing counsel (0.1). Review McGucken's discovery requests, and compile a list of documents and information for A. Raff that need to be collected (2.0). Compiled and organized captures and metadata reports of sites controlled by McGucken and any third-party sites to which McGucken supplied his images, in preparation for bates-stamping and finalizing same for production (3.0).	S. FRANKEL	5.30	1,457.50
----------	---	------------	------	----------

Total Fees:

Billing Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
E LACKMAN	[REDACTED] hours at	\$515.00 =	[REDACTED]
E. NGUYEN	[REDACTED] hours at	\$275.00 =	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
S. FRANKEL	[REDACTED] hours at	\$275.00 =	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 453657

July 22, 2022

REMITTANCE
(please include with payment)

Total Current Charges - This Invoice:



Please remit to:

Mitchell Silberberg & Knupp LLP
2049 Century Park East, 18th Floor
Los Angeles, CA 90067

Wire/ACH Transfer Instructions:

Routing Number or ABA: 121000248
Bank Name: Wells Fargo Bank, N.A.
Bank Address: 420 Montgomery, San Francisco, CA 94104
Beneficiary Account No.: 4159349430
Beneficiary Account Name: Mitchell Silberberg & Knupp LLP
For International Transfers for payments in USD: Swift BIC WFBIUS6S
For International Transfers for payments in currencies other than USD: Swift BIC WFBIUS6WFFX
For payment inquiries please e-mail payment@msk.com

*** Please Include Invoice Number with Payment ***

Note that MSK will not change its banking information without prior notice on our bills. All MSK emails originate from a [3 initials]@msk.com address. Phishing and fraud attempts are common, especially those requesting that you send payment to a new account that does not match our bills. Please don't hesitate to call if you ever have any doubt about the authenticity of any communication.



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 454844

August 18, 2022

LEGAL SERVICES RENDERED through July 31, 2022

Re: ads. Elliot McGucken

[REDACTED]
[REDACTED]
[REDACTED]

Total - current charges:



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 454844

August 18, 2022
 Page 2

ads. Elliot McGucken

Fees through July 31, 2022:

07/01/22	Correspondence with opposing counsel regarding requested change to schedule (0.3); prepare comprehensive overview for expert (1.7).	E. LACKMAN	2.10	1,081.50
07/01/22	Upload Heck expert materials to ftp	E. MOSES	0.10	15.00
07/01/22	Prepare for meet and confer of discovery issues with opposing counsel.	E. NGUYEN	0.30	82.50
07/01/22	Meet and Confer regarding alleged deficiencies in Shutterstock ROG and RFA responses.	E. NGUYEN	1.00	275.00
07/01/22	Review draft production of documents before producing to McGucken.	E. NGUYEN	0.20	55.00
07/01/22	Collect materials for expert, and upload materials to send to expert (0.5); prepare email to S. Heck regarding materials for expert review (0.2).	R. BENYAMIN	0.70	192.50
07/01/22	Meet and confer with opposing counsel regarding alleged deficiencies in Shutterstock's responses to McGucken's discovery requests (1.0). Finalized Shutterstock's first document production bearing Bates range STK000001-STK000622, and served same on opposing counsel (0.4).	S. FRANKEL	1.40	385.00



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 454844

August 18, 2022
 Page 3

07/03/22	Review and prepare response to massive letter from plaintiff to judge (1.9); draft additional follow up points for team (0.4); draft questions for client regarding factual points in letter (0.3).	E. LACKMAN	2.60	1,339.00
07/05/22	Draft letter to court regarding scheduling of hearing (0.6); draft additional document requests to McGucken (0.7); strategy call with team regarding division of work and plans for follow up on deficiencies and motion to compel (0.6).	E. LACKMAN	1.90	978.50
07/05/22	Review, organize and upload data for deposition preparation	E. MOSES	0.50	75.00
07/05/22	Meeting with Eleanor Lackman and Sam Frankel regarding discovery issues.	E. NGUYEN	0.60	165.00
07/05/22	Conference with E. Lackman and E. Nguyen regarding discovery and case strategy (0.6); update deficiency chart (0.1); prepare initial draft of Shutterstock's Third Set of Requests for the Production of Documents to McGucken ("RFP 3"), and email to E. Lackman enclosing same for review and comment (0.3); review E. Lackman's revisions to RFP 3, and revise same to incorporate E. Lackman's comments and suggested revisions (0.6); background research regarding copyright litigation and DMCA defenses to brainstorm additional requests for use in RFP 3 (0.3).	S. FRANKEL	1.90	522.50



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 454844

August 18, 2022
 Page 4

07/06/22	Review amended complaint and outline key factual points for claims and defenses (0.5); draft text of contention interrogatories and requests for admission (1.2); review incoming pre-motion letter and request for timing on response (0.4); draft note to plaintiff's counsel regarding response timing (0.1); review and revise RFAs (0.5); review and revise contention interrogatories (0.6); review and revise document requests (1.1).	E. LACKMAN	4.40	2,266.00
07/06/22	Access links in client email and upload and organize in litigation support and email litigation support for PageVault capture (0.4); email A. Raff regarding access to McGucken box (0.1); retrieve client documents from box and organize in litigation support folders and circulate same (0.3); review case materials including pleadings and discovery for case background and status (1.4); emails with team regarding document production format requirements and interpretations of requests (0.9)	E. MOSES	3.10	465.00
07/06/22	Draft and revise RFAs to McGucken.	E. NGUYEN	1.10	302.50
07/06/22	Prepare and serve certificates of service for ROGs and RFAs.	E. NGUYEN	0.20	55.00
07/06/22	Finalize and serve RFAs, ROGs, and RPF3 to opposing counsel.	E. NGUYEN	0.20	55.00



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 454844

August 18, 2022
Page 5

07/06/22	Draft and revise email list of documents to collect from client for McGucken production.	E. NGUYEN	0.60	165.00
07/06/22	Draft and revise contention interrogatories to McGucken.	E. NGUYEN	1.20	330.00



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 454844

August 18, 2022
 Page 6

07/06/22	Emails to/from E. Lackman and E. Nguyen regarding contention interrogatories and additional document requests (0.3); confirm whether McGucken requested a copy of the metadata that was associated with the claimed images that were uploaded (0.1); confirm whether we objected to producing the notice that led to the termination of Hane Street (0.1); further revisions to Shutterstock Third Set of Requests for the Production of Documents to McGucken (0.7); review and finalize same (0.5); prepare Note to the File regarding July 1, 2022 meet and confer with opposing counsel (1.0); review and correct inaccuracies in opposing counsel's emailing memorializing the July 1 meet and confer (1.0); receipt and review of Pre-Motion Letter Regarding Discovery Dispute from opposing counsel (0.5); review and annotate Pre-Motion Letter in preparation for drafting Shutterstock's position in response to same, including evaluating all inaccuracies and disagreements concerning each discovery request (2.0); review, analyze, and distinguish 6 cases cited by McGucken his portion of the in Pre-Motion Letter (3.0).	S. FRANKEL	9.20	2,530.00
----------	--	------------	------	----------



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 454844

August 18, 2022
 Page 7

07/07/22	Review and respond to comments on joint letter on motion to compel (0.9); draft letter in response to July 1 letter (3.6); review new information from client regarding information about case and draft internal memo regarding same (0.2); revise list of documents for client to collect (0.5).	E. LACKMAN	5.20	2,678.00
07/07/22	Prepare detailed summary of production number/prefix count made in Itasca and depositions for reference in McGucken (0.6); Communications with lit support regarding pagevault capture of shutterstock data and upload to litigation support folder (0.1); locate and circulate Itasca privilege log for E. Lackman (0.1)	E. MOSES	0.80	120.00
07/07/22	Draft and revise joint letter per Court Order regarding proposed protective order language.	E. NGUYEN	0.50	137.50
07/07/22	Email to opposing counsel with proposed draft letter on protective order language per Court order.	E. NGUYEN	0.10	27.50



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 454844

August 18, 2022
Page 8

07/07/22	Review E. Lackman's comments and feedback on annotated version of Pre-Motion Letter (0.3); prepare initial draft of response to McGucken's Pre-Motion Letter (1.9); emails to/from Litigation Support regarding PageVault and metadata captures (0.1); prepared spreadsheet to organize and track all discovery requests and responses in a discovery log, and updated status regarding upcoming deadlines (1.0).	S. FRANKEL	3.30	907.50
07/08/22	Revise letter to court per client comments (0.4); review and revise notice of motion to compel (0.3); review and revised joint letter on protective order (0.8); draft update to expert with additional facts regarding timing and licenses of images (0.7); revise section of joint letter on plaintiff's motion to compel (1.0).	E. LACKMAN	3.20	1,648.00
07/08/22	Organize client documents into litigation support folders, review same and email team regarding same	E. MOSES	0.30	45.00
07/08/22	Team emails regarding document collection and extraction from Shutterstock.	E. NGUYEN	0.10	27.50
07/08/22	Draft Shutterstock's position in response to McGucken's Pre-Motion Letter.	S. FRANKEL	5.90	1,622.50
07/11/22	Organize materials sent to S. Heck into experts file	E. MOSES	0.20	30.00



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 454844

August 18, 2022
 Page 9

07/11/22	Draft and revise supplemental responses to ROG 1; send to Eleanor Lackman.	E. NGUYEN	0.60	165.00
07/11/22	Draft and revise document production deficiency letter to McGucken.	E. NGUYEN	1.30	357.50
07/11/22	Review docket, review outstanding issues and prepare task list of all open items.	E. NGUYEN	0.60	165.00
07/11/22	Compile and organize URLs to be captured for production, and prepare instructions email to Litigation Support regarding same.	S. FRANKEL	0.70	192.50
07/12/22	Review and revise meet and confer letter to Burroughs (0.4); review and respond to plaintiff's counsel regarding court appearance form (0.2).	E. LACKMAN	0.60	309.00
07/12/22	Download McGucken document production, upload to practice support folder and circulate same for team review	E. MOSES	0.30	45.00
07/12/22	Review McGucken's initial document production (MCG000001-MCG000761) and assess whether this production satisfies the issues raised by Shutterstock, whether McGucken produced any documents that have confidential or AEO designations, and whether any documents or information is glaringly missing (1.7); emails to/from Litigation support regarding PageVault captures (0.4).	S. FRANKEL	2.10	577.50



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 454844

August 18, 2022
Page 10

07/13/22	Review materials in preparation for court conference on extension of time, discovery disputes, and confidentiality order and concurrently outline arguments (1.8); participate in conference (1.1); draft report to client regarding same (0.7).	E. LACKMAN	3.60	1,854.00
07/13/22	Review McGucken status email and email team regarding McGucken supplemental production and method of production (0.3); download and review McGucken production and email E. Lackman regarding next steps (0.4)	E. MOSES	0.70	105.00
07/13/22	Review joint letter and send approval to opposing counsel for submission.	E. NGUYEN	0.30	82.50
07/13/22	Attend telephone conference with Hon. Gregory H. Woods regarding current discovery issues (1.0).	S. FRANKEL	1.00	275.00
07/14/22	Split large pdf and organize plaintiff's production vol. 1	E. MOSES	1.00	150.00
07/14/22	Send follow-up email on document collection requests to Andrew Raff.	E. NGUYEN	0.10	27.50
07/15/22	Review and update tasks for fact discovery in light of court ruling (0.4).	E. LACKMAN	0.40	206.00
07/15/22	Review subpoena and Nat Geo company information and retrieve service of process from SOS data and email to team regarding same (0.3); index and organize McGucken production (1.3)	E. MOSES	1.60	240.00



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 454844

August 18, 2022
Page 11

07/15/22	Draft and revise cover letter/amendments to cover letter per Judge's orders on protective order.	E. NGUYEN	0.20	55.00
07/15/22	McGucken meeting.	E. NGUYEN	0.20	55.00
07/15/22	Email to opposing counsel regarding meet and confer time.	E. NGUYEN	0.10	27.50
07/15/22	Update Task List.	E. NGUYEN	0.20	55.00
07/15/22	Team meeting with E. Lackman and E. Nguyen to update status.	S. FRANKEL	0.20	55.00
07/18/22	Emails with Louis Anndeherz regarding collection of documents and issues to address.	E. NGUYEN	0.30	82.50
07/18/22	Email to opposing counsel regarding meet and confer and McGucken deficiencies.	E. NGUYEN	0.10	27.50
07/18/22	Draft and revise new cover letter for protective order and new redline per Judge's orders.	E. NGUYEN	0.40	110.00
07/18/22	Email to opposing counsel regarding Steinmetz deficiencies and meet and confer.	E. NGUYEN	0.10	27.50
07/19/22	Correspondence with client regarding settlement demand (0.2) and draft response and explanation to S. Burroughs regarding same (0.5).	E. LACKMAN	0.70	360.50
07/19/22	Download asset history captures from Shutterstock Box, upload to litigation support folders and convert same to pdfs for production	E. MOSES	0.80	120.00



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 454844

August 18, 2022
 Page 12

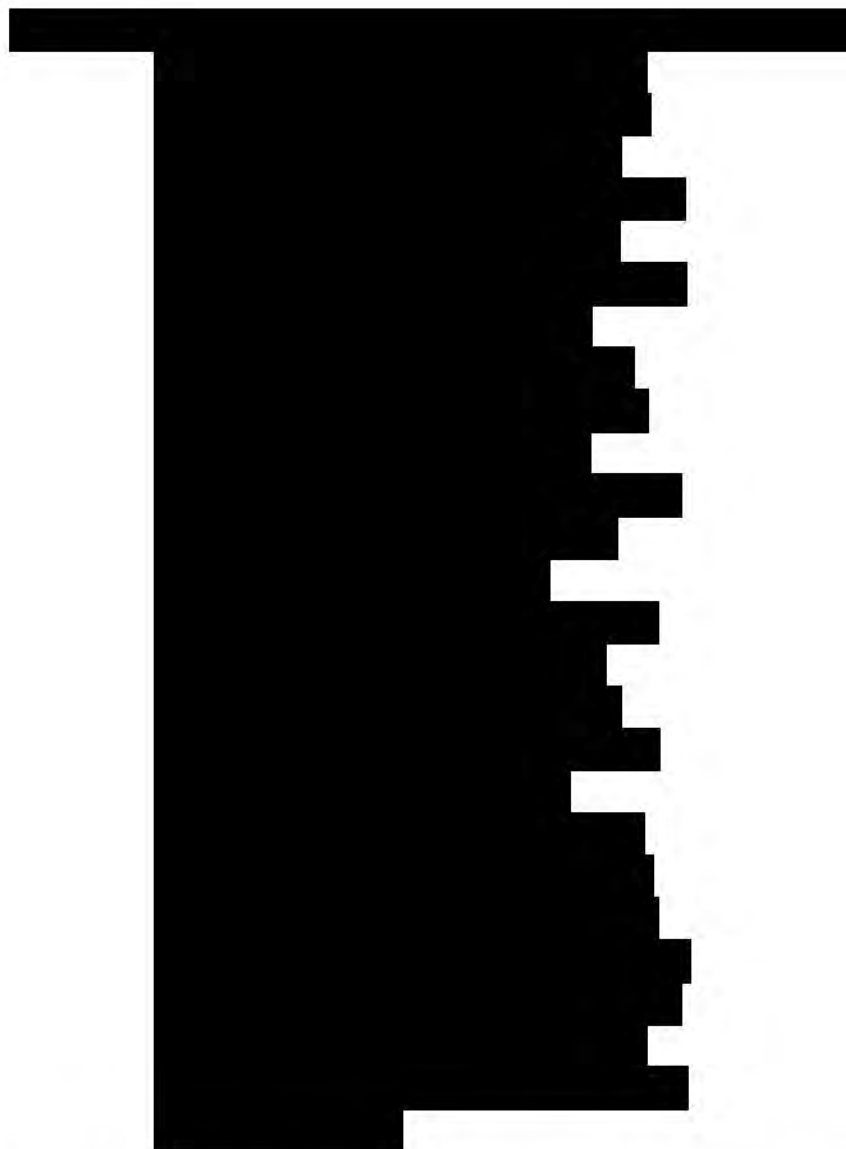
07/19/22	Coordinate with Louis Anndeherz regarding collection of documents and issues to address.	E. NGUYEN	0.30	82.50
07/19/22	Finalize and approve for filing amended protective order submissions per Court order.	E. NGUYEN	0.10	27.50
07/19/22	Emails with Eleanor Lackman regarding Court order and redline for protective order and prepare resubmission.	E. NGUYEN	0.30	82.50
07/20/22	Review emails regarding client data collection, attempt collection and email to client regarding access to data (0.3)	E. MOSES	0.30	45.00
07/20/22	Emails with Louis Anndeherz regarding collection of documents and issues to address.	E. NGUYEN	0.20	55.00
07/21/22	Review and advise on scope of documents in production.	E. LACKMAN	0.50	257.50



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 454844

August 18, 2022
Page 13



07/21/22	Emails with team regarding document production issues and outstanding questions.	E. NGUYEN	0.40	110.00
07/21/22	Check and approve production of documents.	E. NGUYEN	0.30	82.50



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 454844

August 18, 2022
Page 14





07/21/22	Prepare for meet and confer with opposing counsel.	E. NGUYEN	0.40	110.00
07/21/22	Meet and confer with opposing counsel regarding open discovery issues.	E. NGUYEN	0.60	165.00
				0
07/21/22	Meet and confer with opposing counsel regarding discovery deficiencies (0.6); review PageVault captures prepared in response to McGucken's requests for production (0.5); review information provided by L. AnnDeherz regarding document collection (0.4); emails to/from E. Moses and E. Nguyen regarding preparation of document production (0.3); serve Shutterstock's second document production, bearing Bates range STK000623-STK001139 (0.1).	S. FRANKEL	1.90	522.50
07/22/22	Review and prepare documents for production including converting docuSign pdfs to images and creating text searchable copies, bates number documents, organize into production folders, review and analyze client documents regarding various documents (4.2); organize and upload documents for service on plaintiff (0.1)	E. MOSES	4.30	645.00
07/22/22	Review documents for potential production for McGucken.	E. NGUYEN	0.40	110.00



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 454844

August 18, 2022
Page 15

07/22/22	Prepare transmissions emails for Shutterstock's third document production, bearing Bates range STK001140-STK001395 (0.1); serve same on opposing counsel (0.1).	S. FRANKEL	0.20	55.00
07/27/22	Email to team regarding outstanding production documents	E. MOSES	0.10	15.00
07/27/22	Prepare chart for RPF2 responses and objections and send to Eleanor Lackman.	E. NGUYEN	2.50	687.50
				
07/28/22	Review and comment on proposed responses to document requests (1.0); review and follow up on history of deficiencies in document production and depositions (0.4); draft informal responses for client review on second set of contention interrogatories (1.4); review and respond to questions regarding scope of document production (0.1).	E. LACKMAN	2.90	1,493.50

07/28/22	Upload review set of documents to ftp for client review (0.1); index McGucken production (0.6); email R. Benyamin regarding production indices (0.1)	E. MOSES	0.80	120.00
07/28/22	Meeting with Eleanor Lackman, Sam Frankel and Rebecca Benyamin regarding RFPs, Contention Rogs, and discovery strategy.	E. NGUYEN	0.80	220.00



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 454844

August 18, 2022
 Page 17

07/29/22	Meeting with client regarding potential documents for production (0.6); review and revise chart of proposed answers to interrogatories (0.4).	E. LACKMAN	1.00	515.00
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
07/29/22	Meeting with Andrew Raff, Louis Anndeherz, and Eleanor Lackman regarding documents collected re Salesforce Cull.	E. NGUYEN	0.50	137.50
07/29/22	Email to Andrew Raff with select documents for further review and clarification.	E. NGUYEN	0.20	55.00
07/29/22	Exchange emails with E. Moses regarding document productions (0.2); draft discovery request and response chart for plaintiff's second set of interrogatories (3.1); review comments from E. Lackman regarding Rogs chart, and draft email to A. Raff regarding same (0.5); review and analyze A. Raff comments regarding plaintiff's second set of RFPs, and draft Shutterstock's responses to RFPs (2.7).	R. BENYAMIN	6.50	1,787.50

Total Fees:

[REDACTED]



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 454844

August 18, 2022
Page 18

Billing Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
E. LACKMAN	[REDACTED] hours at	\$515.00 =	[REDACTED]
E. NGUYEN	[REDACTED] hours at	\$275.00 =	
S. FRANKEL	[REDACTED] hours at	\$275.00 =	
R. BENYAMIN	[REDACTED] hours at	\$275.00 =	
E. MOSES	[REDACTED] hours at	\$150.00 =	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 454844

August 18, 2022

REMITTANCE

(please include with payment)

Current Fees:

Current Disbursements:

Total Current Charges - This Invoice:

Prior balance due:

TOTAL DUE:

Please remit to:

Mitchell Silberberg & Knupp LLP
2049 Century Park East, 18th Floor
Los Angeles, CA 90067

Wire/ACH Transfer Instructions:

Routing Number or ABA: 121000248
Bank Name: Wells Fargo Bank, N.A.
Bank Address: 420 Montgomery, San Francisco, CA 94104
Beneficiary Account No.: 4159349430
Beneficiary Account Name: Mitchell Silberberg & Knupp LLP
For International Transfers for payments in USD: Swift BIC WFBIUS6S
For International Transfers for payments in currencies other than USD: Swift BIC WFBIUS6WFFX
For payment inquiries please e-mail payment@msk.com

*** Please Include Invoice Number with Payment ***

Note that MSK will not change its banking information without prior notice on our bills. All MSK emails originate from a [3 initials]@msk.com address. Phishing and fraud attempts are common, especially those requesting that you send payment to a new account that does not match our bills. Please don't hesitate to call if you ever have any doubt about the authenticity of any communication.



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022

LEGAL SERVICES RENDERED through August 31, 2022

Re: ads. Elliot McGucken
Disbursements and charges per attached

[REDACTED]
[REDACTED]
[REDACTED]

Total - current charges:

[REDACTED]



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 2

ads. Elliot McGucken

Fees through August 31, 2022:

08/01/22	Review and revise responses to Second RFPs per client comments.	E. LACKMAN	1.10	566.50
08/01/22	Revise document production and circulate for review (0.4); organize production folders and upload production to ftp and circulate same (0.3)	E. MOSES	0.70	105.00
08/01/22	Review McGucken production and serve.	E. NGUYEN	0.70	192.50
08/01/22	Email to Andrew Raff regarding RPF2s and draft responses. (0.1); Email to Eleanor Lackman regarding RPF2 responses and edits. (0.1); Review and revise RFP2 responses. (0.3)	E. NGUYEN	0.50	137.50





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 3

08/01/22	Exchange internal email correspondence regarding Shutterstock's responses to plaintiff's RFPs (0.2); review email from E. Moses regarding index of document productions (0.1); review and analyze email correspondence from A. Raff regarding follow-up on comments to RFPs (0.2); draft and revise Shutterstock's responses to plaintiff's RFPs (2.9); review email from E. Moses and E. Nguyen regarding further document production (0.2); review and finalize Shutterstock's responses to plaintiff's RFPs, and prepare email to opposing counsel regarding same (1.1); exchange internal email correspondence regarding motion to compel (0.1); draft Shutterstock's responses to plaintiff's interrogatories (0.8).	R. BENYAMIN	5.60	1,540.00
08/02/22	<div style="background-color: black; width: 250px; height: 40px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 150px; height: 20px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 320px; height: 20px;"></div> <p>follow up with expert regarding documents and timing for report (0.2); review and comment on approach to answer to Rog 14 (0.5).</p>	E. LACKMAN	1.10	566.50
08/02/22	Research docket regarding deadline for motions to compel for August 3.	E. NGUYEN	0.30	82.50





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 4

08/02/22	Meeting with Eleanor Lackman and Rebecca Benyamin regarding discovery deadlines and motions to compel.	E. NGUYEN	0.50	137.50
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
08/03/22	Review and provide initial outline on McGucken's motion to compel (1.0).	E. LACKMAN	1.00	515.00
08/03/22	Emails with R. Benyamin regarding documents from Itasca to review and produce in McGucken and set up issue tag (0.3)	E. MOSES	0.30	45.00
08/03/22	Update task list to include subpoena to Flickr.	E. NGUYEN	0.10	27.50





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 5

08/03/22	Exchange email correspondence with E. Moses regarding collection and export of documents (0.2); review and analyze pleadings, set one discovery responses, prior meet and confer correspondence between S. Burroughs and E. Lackman, and letters to the court (2.6); draft interrogatory responses (3.7); review plaintiff's notice of motion to compel and proposed order (0.2); outline categories of documents for client to collect for production (2.0).	R. BENYAMIN	8.70	2,392.50
08/04/22	Check final draft of rog responses and make further edits for client review and approval (1.5); review client comments and respond regarding same (0.2).	E. LACKMAN	1.70	875.50
08/04/22	Set up relativity export format and Export Itasca documents selected for potential McGucken review and production and review and organize exports	E. MOSES	2.00	300.00





Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 456182

September 20, 2022
 Page 6

[REDACTED]				
08/04/22	Review E. Lackman's notes and strategy for opposing McGucken's Motion to Compel Shutterstock to Produce Discovery Responses and Evidence (0.1).	S. FRANKEL	0.10	27.50
08/05/22	Respond to questions on interrogatory answers (0.6); review and comment on plaintiff's discovery responses (0.2).	E. LACKMAN	0.80	412.00
08/05/22	Organize docs sent to expert Heck (0.1); export documents from Relativity, export metadata spreadsheet and email memo to R. Benyamin regarding records requested for production review (0.4)	E. MOSES	0.50	75.00





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 7

08/05/22	Outline opposition to motion to compel (0.2); review and analyze RFP responses, and prepare outline of documents for collection (0.7); review email correspondence from A. Raff regarding responses to interrogatories (0.3); revise responses to interrogatories (1.3); exchange internal email correspondence regarding interrogatories (0.3); finalize and serve responses to interrogatories (0.8).	R. BENYAMIN	3.60	990.00
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
08/08/22	Review and provide comments and suggestions on outline for response to motion to compel (1.0).	E. LACKMAN	1.00	515.00
08/08/22	Update Shutterstock document production index	E. MOSES	1.00	150.00





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 8

08/08/22	Review outline to motion to compel (0.6); exchange internal email correspondence regarding strategy and arguments for opposition to motion to compel (0.7); review email from S. Frankel to A. Raff regarding opposition (0.2); review and analyze index of Shutterstock document productions (0.3).	R. BENYAMIN	1.80	495.00
08/08/22	Work on outline of Opposition to Motion to Compel Discovery (3.7); work on E. Lackman Declaration in Opposition to Motion to Compel (0.1); revise outline of Opposition to incorporate E. Lackman's comments and suggested revisions (2.1); email to A. Raff regarding strategy for opposing Motion to Compel (0.5).	S. FRANKEL	6.40	1,760.00
08/09/22	Advise team on document collection scope (0.2).	E. LACKMAN	0.20	103.00
08/09/22	Review MSK and client data and iManage for Exif data and emails with R. Benyamin regarding same (0.6); review A. Raff email and download and organize exif data into litigation support folders, review same and circulate to team (0.3)	E. MOSES	0.90	135.00

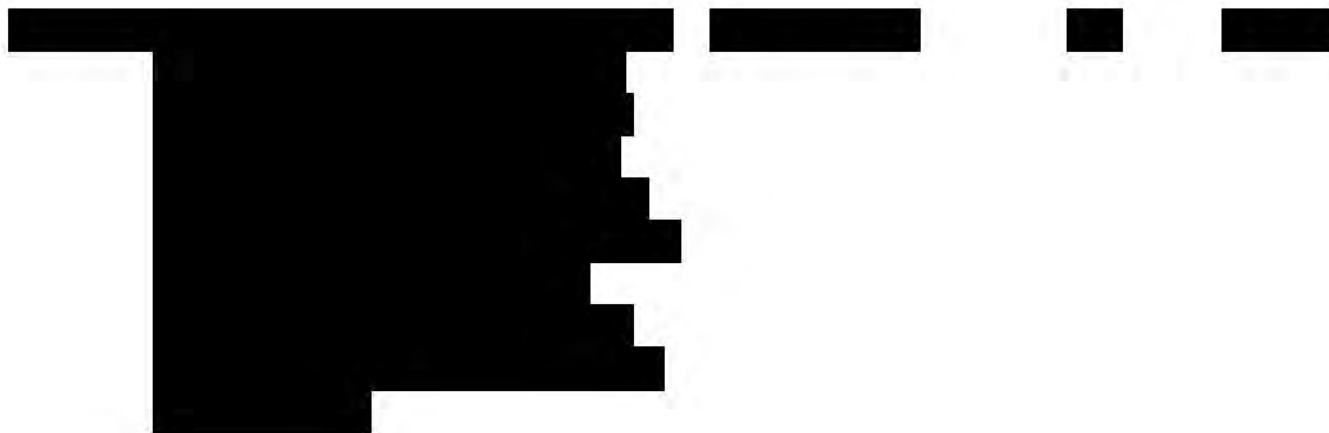




Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 9





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 10

08/09/22	<p>Work on Opposition to Motion to Compel Discovery: emails to/from E. Lackman regarding strategy for opposition (0.4); draft preliminary statement (1.0); draft relevant factual background and procedural history section (1.0); review productions made to date and confirm accuracy of responses in opposition (0.5); draft argument that Plaintiff's motion is premature because his counsel failed to confer on the ESI point per court instruction (2.0); research for SDNY caselaw denying motion to compel ESI (1.0); draft argument that Plaintiff's motion should be denied based on failure to satisfy meet and confer obligations (2.0); research for SDNY caselaw denying motion to compel due to failure to satisfy Rule 37 obligations (1.0); draft argument that motion should be denied because most of the other documents being sought either do not exist or have already been produced (3.0); draft argument that even where documents might exist, Plaintiff's requests are too confusing, burdensome, and irrelevant, and other lawsuits have no relevance to this case (2.0); review A. Raff's feedback to questions, and incorporate same (0.5); email to E. Lackman enclosing draft of Opposition brief for review and comment (0.1).</p>	S. FRANKEL	14.50	3,987.50
----------	--	------------	-------	----------





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 11

08/10/22	Review and revise brief in opposition to motion to compel (2.8); review subsequent draft of brief and provide comments (0.5); review and revise declaration (0.7).	E. LACKMAN	4.00	2,060.00
08/10/22	Review motion to compel; draft and revise motion; draft and revise declaration; prepare exhibits; finalize and arrange for filing.	E. NGUYEN	3.30	907.50
08/10/22	Resolve issues regarding exhibits for filing, final proof after issues address, and coordinate filing. (0.7); Additional edits to declaration in support of motion to compel from Rebecca Benyamin. (0.4); Email to Eleanor Lackman regarding Supplemental responses to the interrogatories. (0.1)	E. NGUYEN	1.20	330.00





Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 456182

September 20, 2022
 Page 12

08/10/22	Exchange internal email correspondence regarding opposition to motion to compel (0.7); review opposition to motion to compel (2.3); review Shutterstock's document productions (0.3); draft and revise declaration of E. Lackman in support of opposition to motion to compel (3.7); review internal email correspondence regarding supplemental interrogatory responses (0.2); add citations to declaration of E. Lackman to opposition to motion to compel (0.3); exchange internal email correspondence regarding filing (0.2).	R. BENYAMIN	7.70	2,117.50
----------	--	-------------	------	----------





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 13

08/10/22	Review and revise Opposition to Motion to Compel, and incorporate E. Lackman's comments and suggested revisions to same (2.0); review transcript of July 13, 2022 Pre-Motion Telephonic Conference regarding discovery dispute before Judge Woods, and incorporate excerpts from same (0.8); research for cases where Judge Woods denied a motion to compel because the movant disregarded his instructions (0.9); revise E. Lackman Declaration in Opposition to Motion to Compel (0.5); final review and revision of Opposition and E. Lackman Declaration, and finalize same for filing with the Court (1.0).	S. FRANKEL	5.20	1,430.00
08/11/22	Review client documents and practice support folders and relativity for Feb 2021 take down letter and emails with R. Benyamin regarding Jan 21 2021 take down letter and 2/11/21 Salesforce email response (0.6) review documents for evidence of 1/21/21 letter referencing Hane street as contributor (0.4)	E. MOSES	1.00	150.00





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 14

08/11/22	Review and analyze documents exported from Itasca file, and create sub-folders for potential production (2.6); exchange email correspondence with E. Moses regarding February 2021 Itasca letter (0.3); circulate email to team regarding documents to review for next production (0.2).	R. BENYAMIN	3.10	852.50
08/12/22	Organize documents for supplemental production and uploading to Eclipse database (0.3); email Eclipse support for setting up database and coding panel and loading data and follow up email with Eclipse support regarding same (0.7); retrieve document with Bishoi contact information and email to R. Benyamin regarding same (0.2); further review of Itasca case data for February 2021 cease and desist and email to team regarding possible options (0.5)	E. MOSES	1.70	255.00
08/12/22	Emails to Eleanor Lackman and Rebecca Benyamin regarding strategy for Supplemental ROGs and Document Collection.	E. NGUYEN	0.20	55.00





Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 456182

September 20, 2022
 Page 15

08/12/22	Draft supplemental interrogatory responses (1.3); emails with E. Moses regarding document production (0.4); review and analyze Shutterstock's document production (0.7); draft email to A. Raff regarding documents to collect for next production (1.1); review and analyze plaintiffs' document production for deficiencies (0.8)	R. BENYAMIN	4.30	1,182.50
08/15/22	Download from box and organize additional client documents for review and production (1.2); assemble for Eclipse vendor to load on database and emails with vendor regarding loading and time zone email loading (0.8)	E. MOSES	2.00	300.00
08/15/22	Meeting with Eleanor Lackman regarding discovery issues and strategy.	E. NGUYEN	0.20	55.00





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 16

08/15/22	Draft supplemental responses to interrogatories (0.1); review plaintiff's reply memorandum in support of motion to compel (0.5); review and analyze email correspondence from A. Raff regarding document collection (0.3); exchange internal email correspondence regarding document review (0.1); review and tag Shutterstock's documents for production (2.1); review and analyze plaintiff's document production, plaintiff's responses to interrogatories, and prepare deficiency chart regarding same (3.9).	R. BENYAMIN	7.00	1,925.00
08/16/22	Review and comment on documents potentially reflecting legal advice (0.2); advise on document scope (0.1); review budget and prepare litigation plan as requested by carrier (0.5).	E. LACKMAN	0.80	412.00





Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 456182

September 20, 2022
 Page 17

08/16/22	Export documents from review set for E. Lackman review (0.4); prepare emails to vendor regarding loading additional information into database and emails with team regarding same (0.2); prepare email to vendor to run export of proposed production documents (0.5); download McGucken production from ftp site and upload to litigation support folders, circulate and review same (0.4)	E. MOSES	1.50	225.00
08/16/22	Review and analyze Shutterstock's documents for production (3.9); email S. Heck regarding scheduling time to discuss expert report (0.1); exchange internal email correspondence regarding documents for production (0.2); draft email to A. Raff regarding infringement notices relating to Hane Street (0.5).	R. BENYAMIN	4.70	1,292.50
08/17/22	Review and revise supplemental initial disclosures to identify new contributor.	E. LACKMAN	0.30	154.50





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 18

08/17/22	Review email regarding providing information to Hane Street counsel and emails with R. Benyamin regarding plan to assemble information (0.4); prepare list of Hane street image and annotate same on McGucken EXIF Image document (1.7); QC and circulate proposed production set (0.1)	E. MOSES	2.20	330.00
08/17/22	Send email to A. Raff regarding infringement notices relating to Hane Street (0.1); review plaintiff's recent document production (1.1); outline and update chart regarding plaintiff's deficiencies (1.4); exchange emails with E. Moses regarding Hane Street images (0.3); exchange internal email correspondence regarding next steps (0.2).	R. BENYAMIN	3.10	852.50
08/18/22	Review production of documents for any privilege issues prior to producing. (0.8); Review charts sent by Rebecca Benjamin with McGucken production inventory, and review latest supplemental document production. (0.5)	E. NGUYEN	1.30	357.50





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 19

08/18/22	Review email from A. Raff regarding infringement notice related to Hane Street (0.1); revise supplemental interrogatory responses, and draft email to A. Raff regarding same (0.7); update deficiency chart, and prepare email to E. Nyugen regarding documents produced in plaintiff's recent production (0.7).	R. BENYAMIN	1.50	412.50
08/19/22	Review and revise chart of deficiencies in documents (1.3); review and draft notes on deficiencies in interrogatory answers (0.7); revise deficiency letter (0.7).	E. LACKMAN	2.70	1,390.50
08/19/22	Prepare instructions for Eclipse support to run production and QC final production and circulate to team (0.5); prepare ftp of production and organize production folders (0.3)	E. MOSES	0.80	120.00
08/19/22	Draft and revise deficiency letter to McGucken regarding discovery deficiencies. (1.4); Emails with Rebecca Benyamin regarding potential privilege documents and analysis. (0.4)	E. NGUYEN	1.80	495.00





Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 456182

September 20, 2022
 Page 20

08/19/22	Review and analyze documents for privilege (1.2); review email from A. Raff regarding supplemental responses to interrogatories 1 and 2, and finalize same (0.2); exchange email correspondence with team and A. Raff to schedule call regarding discovery tasks (0.2); exchange internal email correspondence regarding plaintiff's document production and deficiency letter (0.2); finalize and serve Shutterstock's document production (0.4); review and analyze previous interrogatory responses to supplement (0.4); review comments from E. Lackman regarding deficiencies in plaintiff's document production (1.7); draft and revise deficiency letter (1.0).	R. BENYAMIN	5.30	1,457.50
08/20/22	Review comments from E. Lackman regarding document deficiencies, and revise deficiency letter (0.6).	R. BENYAMIN	0.60	165.00





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 21

08/21/22	Draft supplemental response to plaintiff's interrogatory number 14 (0.2); review comments from E. Lackman regarding plaintiff's deficient interrogatory responses, and draft deficiency letter regarding same (1.2); review comments from E. Lackman regarding document deficiencies, and revise deficiency letter regarding same (2.0).	R. BENYAMIN	3.40	935.00
08/22/22	Review and revise portion of deficiency letter relating to interrogatory answers and updated document responses (0.7); review RFAs and draft insert for deficiency letter identifying issues with RFAs (0.3); draft heavy outline of issues for expert to address in expert report (1.4).	E. LACKMAN	2.40	1,236.00
08/22/22	Address issues regarding ECF notification on transcript; emails to team on the same. (0.2); Draft and revise letter to McGucken on discovery deficiencies; finalize and serve. (0.4); Address issues with AEO designation and check for any outstanding unproduced documents to designate as AEO. (0.4)	E. NGUYEN	1.00	275.00





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 22

08/22/22	Review email from E. Lackman regarding new DMCA case, and collect case for file (0.6); review email from E. Lackman to expert regarding case issues and expert report (0.2); review and finalize deficiency letter to opposing counsel regarding plaintiff's deficiencies regarding document production and discovery responses (0.2); review and analyze prior emails on next steps and update task list regarding same (1.2); prepare for call with A. Raff regarding outstanding discovery items (0.5); draft chart for objections and responses to plaintiff's RFPs set 3 (0.4).	R. BENYAMIN	3.10	852.50
08/23/22	Conference with client regarding potential documents to withhold (0.4); review and revise objections to deposition notice (0.9).	E. LACKMAN	1.30	669.50





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 23

08/23/22	Emails with opposing counsel regarding meet and confer on Shutterstock's deficiency letter to McGucken. (0.1); Draft and revise responses and objections letter to 30(b)(6) notice to Shutterstock. (0.5)	E. NGUYEN	0.60	165.00
08/23/22	Prepare for and attend video conference with team and A. Raff regarding outstanding discovery issues (0.6); prepare notes of items discussed during conference call (0.2).	R. BENYAMIN	0.80	220.00
08/24/22	Emails with opposing counsel regarding issues on 30(b)(6) topic objections and request to meet and confer on a separate date. (0.2); Review amended deposition notice from McGucken and emails to team regarding the same. (0.2)	E. NGUYEN	0.40	110.00





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 24

08/24/22	Review email from E. Moses regarding updated index of Shutterstock's document productions (0.1); draft supplemental response to interrogatory no. 14, and prepare email to team regarding same (0.5); send supplemental response to interrogatory no. 14 to A. Raff for signature (0.1); review discovery request and response chart, and strategize interrogatories to ask for next set of interrogatories (0.6); review email correspondence with L. Zaharia regarding meet and confer call (0.1).	R. BENYAMIN	1.40	385.00
08/25/22	Conference with S. Heck regarding scope of report and items for follow up (1.4).	E. LACKMAN	1.40	721.00
08/25/22	Organize/index most recent McGucken production (0.6); email team regarding plaintiff designated "use" documents produced (0.1)	E. MOSES	0.70	105.00





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 25

08/25/22	Review and email Rebecca Benyamin regarding post meet and confer email memorializing positions. (0.2); Draft and revise update email to Eleanor Lackman regarding meet and confer summary. (0.2); Call with Rebecca Benyamin regarding meet and confer, drafting memorializing email to confirm opposing counsel's positions. (0.2); Meet and Confer with Laura Zaharia regarding deficiencies to McGucken's RFAs, RPFs, and ROGs. (1.0)	E. NGUYEN	1.60	440.00
08/25/22	Review deficiency letter in preparation of meet and confer call with L. Zaharia regarding deficiencies in discovery responses and document production (1.2); telephone conference with L. Zaharia regarding meet and confer re discovery deficiencies (1.0); organize notes on meet and confer call (0.5); draft and revise email correspondence to L. Zaharia memorializing meet and confer discussion (3.4); exchange internal email correspondence regarding sending documents to expert (0.2).	R. BENYAMIN	6.30	1,732.50
08/26/22	Draft summary for client regarding material requested by expert.	E. LACKMAN	0.30	154.50





Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 456182

September 20, 2022
 Page 26

08/26/22	Update task list for additional discovery items (0.3); prepare chart on objections and responses to plaintiff's third set of requests for production (1.2); finalize supplemental response to interrogatory no. 14 and serve on opposing counsel (0.4); exchange internal email correspondence regarding new discovery (0.2); review plaintiff's document production for cease and desist letters (0.8).	R. BENYAMIN	2.90	797.50
08/29/22	Review documents reflecting use and email to R. Benyamin regarding same (0.1); Prepare documents for expert Heck and upload to litigation support folders, upload to ftp for transfer to expert and organize expert folder(1.1)	E. MOSES	1.20	180.00





Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 456182

September 20, 2022
 Page 27

08/29/22	Emails with Rebecca Benyamin, Eleanor Lackman, and Scott Burroughs regarding failure to comply with meet and confer obligations in connection with Shutterstock's 30(b)(6) objections. (0.5); Prepare for meet and confer with opposing counsel on Shutterstock's 30(b)(6) objections. (0.5); Meet and confer with opposing counsel Scott Burroughs regarding Shutterstock's 30(b)(6) topic responses and objections. (0.5)	E. NGUYEN	1.50	412.50
08/29/22	Update task list (0.1); review and collect documents of identified use to send to expert, and exchange emails with E. Moses regarding same (2.0); draft chart on objections and responses to plaintiff's third set of requests for production (0.8); review objections to Rule 30(b)(6) deposition notice in preparation of meet and confer (0.2); telephone conference with S. Burroughs regarding meet and confer on 30(b)(6) deposition objections (0.5); review email correspondence with S. Burroughs and team regarding meet and confer (0.2).	R. BENYAMIN	3.80	1,045.00





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 28

08/30/22	Meet and confer with S. Burroughs regarding deposition objections (1.0); follow up correspondence with adversary regarding same (0.5); team planning call regarding strategy for depositions and clean-up discovery items (1.0); review and revise chart of responses to third document requests (0.4).	E. LACKMAN	2.90	1,493.50
08/30/22	Emails with R. Benyamin regarding organizing cease and desist letters produced and multiple attempts to	E. MOSES	1.00	150.00
08/30/22	Draft and revise email to Andrew Raff regarding deposition notices and scheduling for prep sessions and depositions. (0.2); Draft and revise summary meet and confer email to Scott Burroughs and send upon approval from Eleanor Lackman. (0.4); Email to Scott Burroughs regarding failure to comply with meet and confer obligations in connection with 30(b)(6) objections. (0.1); Meet and confer with Scott Burroughs, Eleanor Lackman regarding Shutterstock's 30(b)(6) objections. (0.8); Meeting with Eleanor Lackman and Rebecca Benyamin regarding discovery responses and deposition notices. (1.0)	E. NGUYEN	2.50	687.50





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 29

08/30/22	Review email correspondence between E. R. BENYAMIN Lackman and S. Burroughs regarding meet and confer (0.4); review and analyze categories of documents produced by plaintiff and determine potential areas for additional document requests (1.5); telephone conference with team and S. Burroughs regarding meet and confer on objections to 30(b)(6) deposition topics and S. Patel deposition (0.8); prepare and organize notes on meet and confer call (0.2); review email from E. Nyugen to S. Burroughs regarding summary of meet and confer call (0.1); team meeting regarding tasks and next steps for discovery (1.0); update task list (0.2); review index of Shutterstock's productions for license agreements produced, and email E. Nyugen regarding same (0.3).	4.50	1,237.50
08/31/22	Draft and revise deposition notice to Elliot McGucken; send to Eleanor Lackman. (0.2); Research on subpoenas to Flickr and address; reach out to Library regarding the same. (0.2)	0.40	110.00





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 30

[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
08/31/22	Review comments from E. Lackman regarding chart for responses to plaintiff's third set of requests for production, and draft email to A. Raff regarding same (0.6).	R. BENYAMIN	0.60	165.00

Total Fees:

[REDACTED]

Billing Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
E. LACKMAN	[REDACTED] hours at	\$515.00 =	[REDACTED]
E. NGUYEN	[REDACTED] hours at	\$275.00 =	
S. FRANKEL	[REDACTED] hours at	\$275.00 =	
R. BENYAMIN	[REDACTED] hours at	\$275.00 =	
E. MOSES	[REDACTED] hours at	\$150.00 =	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
SUMMARY TOTALS	[REDACTED]	[REDACTED]	[REDACTED]





Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022
Page 31

Costs Advanced and In-House Services:

[REDACTED]

[REDACTED]

[REDACTED]

Total Costs:

[REDACTED]

Total Fees & Costs:

[REDACTED]



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 456182

September 20, 2022

REMITTANCE
(please include with payment)

Current Fees:

Current Disbursements:

Total Current Charges - This Invoice:

Please remit to:

Mitchell Silberberg & Knupp LLP
2049 Century Park East, 18th Floor
Los Angeles, CA 90067

Wire/ACH Transfer Instructions:

Routing Number or ABA: 121000248
Bank Name: Wells Fargo Bank, N.A.
Bank Address: 420 Montgomery, San Francisco, CA 94104
Beneficiary Account No.: 4159349430
Beneficiary Account Name: Mitchell Silberberg & Knupp LLP
For International Transfers for payments in USD: Swift BIC WFBIUS6S
For International Transfers for payments in currencies other than USD: Swift BIC WFBIUS6WFFX
For payment inquiries please e-mail payment@msk.com

*** Please Include Invoice Number with Payment ***

Note that MSK will not change its banking information without prior notice on our bills. All MSK emails originate from a [3 initials]@msk.com address. Phishing and fraud attempts are common, especially those requesting that you send payment to a new account that does not match our bills. Please don't hesitate to call if you ever have any doubt about the authenticity of any communication.

☐ I am able to receive future statements via email. Please send them to:

Contact name: _____

Email address: _____



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 457008

October 10, 2022

LEGAL SERVICES RENDERED through September 30, 2022

Re: ads. Elliot McGucken
Disbursements and charges per attached

[REDACTED]

[REDACTED]

[REDACTED]

Total - current charges:



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 457008

October 10, 2022
 Page 2

ads. Elliot McGucken

Fees through September 30, 2022:

09/01/22	Review and revise interrogatory set 3 (0.5); review and revise document request set 4 (0.5).	E. LACKMAN	1.00	515.00
09/01/22	Emails to server regarding Flickr subpoena. (0.2); Email to opposing counsel regarding availability of Shutterstock witnesses. (0.1); Review research regarding McGucken prior depositions and review Newsweek deposition and provide analysis to Eleanor Lackman. (0.5); Emails with Eleanor Lackman regarding strategy for depositions and prep sessions for Alexandra Zusman and Heather Shimmin. (0.1); Draft and revise subpoena to Flickr. (0.1); Send notice of deposition to Elliot McGucken. (0.1)	E. NGUYEN	1.10	302.50
09/01/22	Continue Research on Elliot McGucken and related dockets; Pull and send deposition transcript; Send docket list and related documents. (E. Nguyen)	L. DEARY	3.50	525.00



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 457008

October 10, 2022
 Page 3

09/01/22	Draft third set of interrogatories (0.8); draft fourth set of requests for production (0.9); exchange internal email correspondence regarding depositions (0.2); review and revise interrogatories and requests for production (1.0); exchange internal email correspondence regarding upcoming deadlines (0.1); review library's research on McGucken's past depositions (0.2).	R. BENYAMIN	3.20	880.00
09/02/22	Conference with S. Heck regarding outline for expert report (0.9); review and sign off on subpoena to Flickr (0.1).	E. LACKMAN	1.00	515.00
09/02/22	Service notice of subpoena re: Flickr to opposing counsel. (0.1); Draft and revise subpoena to Flickr and update with compliance address. (0.1)	E. NGUYEN	0.20	55.00
09/02/22	Prepare for call with S. Heck regarding expert report (0.2); telephone conference with S. Heck regarding expert report (0.7); exchange internal email correspondence regarding requests for production and interrogatories (0.3); finalize and serve requests for production and interrogatories (0.7); review emails from L. Zaharia and E. Lackman regarding items discussed on meet and confer call (0.1); exchange internal email correspondence regarding items for expert (0.1).	R. BENYAMIN	2.10	577.50



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 457008

October 10, 2022
Page 4

09/08/22	Coordinate TSG reporting reporter for McGucken deposition. (0.1); Review document productions to select documents to show for 30(b)(6) prep. (1.2)	E. NGUYEN	1.30	357.50
09/08/22	Exchange internal email correspondence regarding deposition prep materials (0.2); prepare outline for McGucken's deposition (0.8).	R. BENYAMIN	1.00	275.00
09/09/22	Organize and create text searchable versions of Plaintiff's production (0.7) ; organize shutterstock production into individual documents (1.0)	E. MOSES	1.70	255.00
09/09/22	Exchange internal email correspondence regarding deposition prep materials and strategy (0.2); telephone call with E. Nguyen regarding strategy to collect documents for deposition prep sessions (0.2); draft follow-up email to A. Raff regarding responses to plaintiff's requests for production set 3 (0.1); review and redline outline of expert report (1.7); search document productions for H. Shimmin and A. Zusman (0.6); collect and organize folder of relevant documents for H. Shimmin deposition prep, and prepare outline regarding same (2.2); exchange emails with E. Moses regarding document productions and organization of same (0.2).	R. BENYAMIN	5.20	1,430.00



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 457008

October 10, 2022
Page 5

09/11/22	Review associate mark-up of expert report and provide additional supplementation on same (0.3); review and comment on supplemental interrogatory answers (0.5).	E. LACKMAN	0.80	412.00
09/11/22	Prepare and organize deposition prep materials for H. Shimmin (1.5); exchange internal email correspondence regarding deposition prep (0.3); review redline comments to S. Heck expert report outline, and prepare email to E. Lackman regarding same (0.2).	R. BENYAMIN	2.00	550.00
09/12/22	Continue review and comment on supplemental interrogatory answers (1.0); follow up with opposing counsel regarding deposition scheduling (0.2); prepare A. Zusman for deposition (1.2); review proposed prep materials for H. Shimmin deposition and revise same (2.4); review and provide comment on deposition document collection for additional materials to include for prep (0.8).	E. LACKMAN	5.60	2,884.00
09/12/22	Download production from Plaintiff, create text searchable version and review same and email to team regarding production content	E. MOSES	0.80	120.00
09/12/22	Prep session with Alexandra Zusman. (1.2); Team meeting to discuss prep for Shutterstock witnesses. (0.5)	E. NGUYEN	1.70	467.50



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 457008

October 10, 2022
 Page 6

09/12/22	Review and prepare list of potential documents to show Alexandra Zusman for prep.	E. NGUYEN	0.40	110.00
09/12/22	Schedule call with E. Lackman and S. Heck (0.1); team meeting regarding deposition preparation (0.5); draft outline for H. Shimmin deposition prep, collect and organize relevant documents for deposition prep (3.9); exchange internal email correspondence regarding deposition prep materials and strategy (0.2); prepare email to H. Shimmin regarding documents to review prior to deposition prep session (0.4); review plaintiff's document production (0.3); review and analyze E. Lackman comments on plaintiff's supplemental interrogatory responses (0.1).	R. BENYAMIN	5.50	1,512.50
09/13/22	Prep for deposition with H. Shimmin.	E. LACKMAN	2.00	1,030.00
09/13/22	Prepare documents for Shutterstock 30b6 deposition (1.8); download and circulate plaintiff's production and upload in litigation support folders (0.5)	E. MOSES	2.30	345.00
09/13/22	Review and analyze plaintiff's supplemental interrogatory responses (0.7); organize deposition prep materials for H. Shimmin (0.6); attend deposition prep session for H. Shimmin (2.2); draft responses to plaintiff's third set of requests for production (1.3).	R. BENYAMIN	4.80	1,320.00



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 457008

October 10, 2022
 Page 7

09/14/22	Review and comment on RFP 3 responses (0.3); review and revise joint letter to court regarding deficiencies in interrogatory answers and discovery responses.	E. LACKMAN	0.80	412.00
09/14/22	Draft and revise deficiency letter/pre-motion conference letter to Judge Woods on deficiencies. (2.2); Email with opposing counsel regarding Shutterstock depositions and inquiry as to McGucken deposition availability. (0.1)	E. NGUYEN	2.30	632.50
09/14/22	Prepare follow-up email to A. Raff regarding responses to plaintiff's third set of requests for production (0.1); review comments from A. Raff regarding items for follow-up, and draft responses to plaintiff's third set of requests for production (1.0); revise and finalize responses (0.8).	R. BENYAMIN	1.90	522.50
09/15/22	Conference with S. Heck regarding approach on expert report.	E. LACKMAN	0.60	309.00
09/15/22	Organize materials in expert Heck folder	E. MOSES	0.10	15.00
09/15/22	Review expert report outline (0.2); telephone conference with S. Heck regarding items for expert report (0.6); prepare email to S. Heck regarding 56.1 statement in Steinmetz case (0.1); prepare and organize documents for deposition of H. Shimmin (1.0); review email from A. Raff regarding items for expert (0.1).	R. BENYAMIN	2.00	550.00



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 457008

October 10, 2022
Page 8

09/16/22	Email to client regarding Google Drive access; download the CLDSTORAGE image files, upload to practice support, analyze same and email to client regarding confirmation of full folder download (1.2); email R. Benyamin regarding image file production and review Itasca production to confirm same made natively (0.2)	E. MOSES	1.40	210.00
09/16/22	Emails to opposing counsel regarding deposition logistics and email to client regarding the same.	E. NGUYEN	0.20	55.00
09/16/22	Prepare folder of dockets for H. Shimmin deposition preparation (1.6); H. Shimmin deposition prep session (0.8); review emails from A. Raff and E. Moses regarding document collection (0.2).	R. BENYAMIN	2.60	715.00
09/17/22	Finalize documents to send H. Shimmin for deposition preparation, upload documents to ftp file, and prepare email to H. Shimmin regarding same (0.3); prepare cheat sheet of talking points for H. Shimmin deposition (1.0).	R. BENYAMIN	1.30	357.50
09/18/22	Review and comment on proposed "cheat sheet" for H. Shimmin deposition (1.2); draft initial comments for approach on McGucken deposition outline (0.3).	E. LACKMAN	1.50	772.50
09/19/22	Defend deposition of A. Zusman (2.5); draft follow up prep points for H. Shimmin coming out of deposition (1.0).	E. LACKMAN	3.50	1,802.50



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 457008

October 10, 2022
Page 9

09/19/22	Prepare ftp upload for Heather Shimmin deposition pre (0.2); download McGucken production and organize and circulate same (0.5); review Shutterstock data for information re upload photo dates, prepare list of asset ids and prepare request for project assistant support for upload date projects (1.0); organize materials sent to expert in expert folder (0.1)	E. MOSES	1.80	270.00
09/19/22	Review emails from E. Lackman regarding deposition of A. Zusman (0.2); draft and revise cheat sheet of talking points for H. Shimmin deposition (2.6); exchange email correspondence with E. Moses regarding document production (0.2); review plaintiff's document production (3.2); prepare email to S. Heck regarding Steinmetz counterstatement of facts (0.1); review and analyze emails from E. Lackman regarding outline for E. McGucken deposition (0.2); prepare outline for deposition of E. McGucken (0.8).	R. BENYAMIN	7.30	2,007.50
09/20/22	Additional prep with H. Shimmin (0.5); defend deposition of H. Shimmin (8.2).	E. LACKMAN	8.70	4,480.50
09/20/22	Explain asset id list to Project Assistant and obtain rights to litigation support folder and review and circulate final list (0.6); organize materials sent to expert S. Heck (0.1)	E. MOSES	0.70	105.00



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 457008

October 10, 2022
 Page 10

09/20/22	Review production and update deficiency letter and file with the Court.	E. NGUYEN	1.30	357.50
09/20/22	Review plaintiff's document production, and prepare summary of same (2.3); review and analyze Shutterstock's index of document productions (0.4); review letter to court regarding plaintiff's discovery deficiencies (0.2); prepare email to S. Heck regarding spreadsheet of licenses and pricing (0.1); draft outline for E. McGucken deposition (1.9); exchange internal email correspondence regarding questioning for E. McGucken deposition (0.2); exchange emails with E. Moses regarding list of submission and approval dates of photos at issue (0.1).	R. BENYAMIN	5.20	1,430.00
09/21/22	Review and annotate prior McGucken transcript in preparation for upcoming deposition.	E. LACKMAN	4.50	2,317.50
09/21/22	Emails for support for R. Benyamin McGucken depo prep	E. MOSES	0.20	30.00
09/21/22	Review "joint" letter portion by McGucken regarding issues raised by Shutterstock.	E. NGUYEN	0.20	55.00
09/21/22	Prepare email to A. Raff regarding document collection (0.2); review plaintiff's response to pre-motion letter to judge (0.1); draft outline for deposition of E. McGucken (4.0).	R. BENYAMIN	4.30	1,182.50



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 457008

October 10, 2022
Page 11

09/22/22	Email project assistant regarding location of production documents and further instructions regarding assembling documents for deposition	E. MOSES	0.10	15.00
09/22/22	Call with Rebecca Benyamin and prepare for McGucken Deposition/draft and revise outline.	E. NGUYEN	2.30	632.50
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
09/22/22	Review email from E. Lackman regarding McGucken deposition (0.2); exchange internal email correspondence regarding E. McGucken deposition (0.4); telephone call with E. Nyugen regarding exhibits and tasks for E. McGucken deposition (0.3); review and analyze deposition transcript from Newsweek case, and comments from E. Lackman regarding same (2.1); prepare list of materials to collect for deposition exhibits, and emails with E. Moses and R. Stevenson regarding same (1.3); prepare outline for deposition of E. McGucken (1.4); emails with E. Nyugen regarding copyright registrations (0.1).	R. BENYAMIN	5.80	1,595.00
09/22/22	Prepared PDFs and captured relevant Internet sites	R. STEVENSON	3.00	450.00
09/23/22	Review Complaint images and prepare produced registration spreadsheet (.2)	D. KNISS	0.20	30.00



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 457008

October 10, 2022
Page 12

09/23/22	Email R. Stevenson, Project Assistant regarding similar photos assignment and case background and follow up emails regarding client assistance with search (0.2); review R. Benyamin email regarding list of licensed photos, locate same in production documents and email to R. Benyamin regarding same (0.3)	E. MOSES	0.50	75.00
09/23/22	Review derivatives of original image files collected from client for responsiveness (1.3); exchange internal emails regarding preparation of spreadsheet for images licensed, and review of same (0.3); email L. Anndeherz regarding search of similar images for E. McGucken deposition (0.2); exchange internal emails regarding collection and organization of exhibits for E. McGucken deposition (0.4); review and analyze McGucken deposition transcript in Newsweek case (1.2); draft questions for E. McGucken deposition, and prepare deposition exhibits (5.6).	R. BENYAMIN	9.00	2,475.00
09/24/22	Draft licensing history section of E. McGucken deposition outline (2.2).	R. BENYAMIN	2.20	605.00



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 457008

October 10, 2022
 Page 13

09/25/22	Review responses to requests for admission and interrogatories, and identify areas for further questioning (1.3); review DMCA notice letter, and draft questions regarding same for E. McGucken deposition outline (2.1); draft questions regarding investigations, and uses for E. McGucken deposition outline (2.0); prepare email to R. Stevenson and E. Moses regarding documents to collect for exhibits (0.2); review G. Steinmetz deposition outline, and identify areas for further questioning (0.7); prepare email to E. Nyugen regarding tasks for deposition outline (0.1).	R. BENYAMIN	6.40	1,760.00
09/26/22	Review copyright registrations in complaint and compare with document productions (1.8)	D. KNISS	1.80	270.00
09/26/22	Conference with counsel for defendant in McGucken suit claiming images came from Shutterstock (1.0); review and revise deposition outline (3.2); draft memo to team regarding additional points and angles for clean-up for deposition (0.6).	E. LACKMAN	4.80	2,472.00



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 457008

October 10, 2022
 Page 14

09/26/22	<p>Review emails regarding production and check Itasca production of images and prepare McGucken images for production (0.8); review [REDACTED] emails with E. Lackman and complaint and confirm images identified in McGucken complaint and on licensee list and in take down notices and emails to team regarding [REDACTED] (1.3); download and upload to client document collections similar images list prepared by Heather Shimmin and circulate same (0.4);</p>	E. MOSES	2.50	375.00
09/26/22	<p>Email comparison regarding images in North Carolina Complaint. (0.2); Draft and revise McGucken Deposition outline. (2.5); Call from and emails regarding counsel in North Carolina served with papers relating to McGucken images licensed by Shutterstock. (0.3)</p>	E. NGUYEN	3.00	825.00



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 457008

October 10, 2022
Page 15

09/26/22	Review and finalize documents for production (1.2); exchange internal emails regarding document production (0.2); prepare outline for E. McGucken deposition, and assemble exhibits regarding same (5.1); exchange emails with R. Stevenson and E. Moses regarding website captures (0.2); review email from D. Kniss regarding copyright registrations (0.1); exchange internal emails regarding E. McGucken suit against LA Trend (0.2); review cease and desist letter to LA Trend, and emails regarding same (0.4); telephone call with E. Nyugen regarding E. McGucken deposition (0.3).	R. BENYAMIN	7.70	2,117.50
----------	---	-------------	------	----------

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 457008

October 10, 2022
 Page 16

09/27/22	Download and organize client documents regarding similar images and circulate same and conference with R. Benyamin about method to request non watermarked images from client (0.6); upload and organize McGucken production in litigation support folders (0.3); email A. Raff regarding CldStore file information (0.1); upload production of images to ftp and circulate same for service and save to production folders (0.4); extract and prepare deposition potential exhibits from McGucken production and update production folders and email to R. Benyamin regarding same(1.2)	E. MOSES	2.60	390.00
09/27/22	Draft and revise McGucken deposition prep outline per comments and conversations with Rebecca Benyamin. (1.3); Calls with Rebecca Benyamin regarding McGucken Deposition prep. (0.7); Draft and revise McGucken deposition outline. (1.9); Finalize and serve production to McGucken. (0.3); Prepare for McGucken deposition. (0.4)	E. NGUYEN	4.60	1,265.00



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 457008

October 10, 2022
Page 17

09/27/22	Review and analyze E. Lackman comments and redline regarding draft deposition outline, and draft deposition outline regarding same (6.9); call with E. Moses regarding export of similar images for exhibits (0.2); exchange internal emails regarding website captures (0.4); review emails from H. Shimmin, A. Raff, and L. Anndeherz regarding similar images and additional uses on other websites (0.5); telephone conference with E. Nyugen regarding preparation for deposition and organization of exhibits (0.1); review and analyze plaintiff's second supplemental interrogatory responses (1.2); review plaintiff's document production, and emails with team regarding same (1.3); prepare and assemble documents in deposition exhibit folder (2.6); email correspondence with team regarding deposition preparation and exhibits (0.2); emails with E. Nyugen regarding TinEye uses and Rule 11 motion letter to include in deposition outline (0.2); prepare email to team regarding final deposition outline and tasks (0.2).	R. BENYAMIN	13.80	3,795.00
09/28/22	Prepare webpages to use as deposition exhibits (.9)	D. KNISS	0.90	135.00



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 457008

October 10, 2022
Page 18

09/28/22	Prepare for deposition of E. McGucken by reviewing outline (0.5); take deposition of E. McGucken (8.4); draft notes regarding same for client (0.4).	E. LACKMAN	9.30	4,789.50
09/28/22	Extract and circulate McGucken Cease and Desist letter for McGucken deposition	E. MOSES	0.20	30.00
09/28/22	Deposition of Elliot McGucken. (2.0); Address logistical issues relating to McGucken deposition. (0.3); Strategy relating to Flickr Subpoena. (0.3); Finalize exhibits for McGucken deposition. (0.4)	E. NGUYEN	3.00	825.00
09/28/22	Emails with D. Kniss and E. Nyugen regarding website captures (0.2); review additional documents and assemble in deposition exhibits folder (0.4); review and finalize deposition outline with additional exhibits (1.3); emails with R. Stevenson regarding additional website captures (0.1); emails with E. Nyugen regarding exhibits and file share (0.2); attend deposition of E. McGucken (7.7); review emails from E. Lackman and A. Raff regarding E. McGucken deposition and LA Trend lawsuit (0.2); exchange emails with E. Lackman regarding copyright registrations (0.2).	R. BENYAMIN	10.30	2,832.50



Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 457008

October 10, 2022
Page 19

09/29/22	Conference with client regarding indemnification request from McGucken claim (0.4); draft portions of deficiency letter (0.3); review incoming deficiency letter and draft note to team regarding same (0.2).	E. LACKMAN	0.90	463.50
09/29/22	Call with Dimi from Smug Mug regarding Flickr subpoena.	E. NGUYEN	0.20	55.00
09/29/22	Prepare email to S. Heck regarding expert report (0.2); organize and upload exhibits to TSG (0.7); review email from E. Lackman to S. Heck regarding E. McGucken deposition (0.1); exchange internal emails regarding discovery next steps (0.2); review meet and confer letter from opposing counsel regarding discovery deficiencies, and exchange internal emails regarding same (0.6).	R. BENYAMIN	1.80	495.00
09/30/22	Conference with Flickr counsel regarding subpoena (0.6); review and comment on proposed joint letter regarding deposition misbehavior and RFA deficiencies (0.5).	E. LACKMAN	1.10	566.50
09/30/22	Review McGucken production for record of McGucker Flickr Photos and email to R. Benyamin regarding same (0.2); review multiple Shutterstock cases for Heck CV and retrieve and circulate Heck LinkedIn profile (0.2)	E. MOSES	0.40	60.00



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 457008

October 10, 2022
 Page 20

09/30/22	Draft and revise deficiency letters and emails to McGucken. (0.3); Email to client regarding meet and confer letter from opposing counsel. (0.1); Modify Flickr Subpoena and notice of subpoena to Smugmug. (0.4)	E. NGUYEN	0.80	220.00
09/30/22	Draft and revise emails and letters regarding deficiencies in RFAs and rulings on deposition privilege assertions.	E. NGUYEN	3.20	880.00

Total Fees:



Shutterstock, Inc.
 350 Fifth Avenue
 New York, NY 10118
 Ebill through CounselGo

Atty No.: 00750
 Client ID: 50744-00009
 Invoice: 457008

October 10, 2022
 Page 21

Billing Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
E. LACKMAN	[REDACTED] hours at	\$515.00 =	[REDACTED]
R. BENYAMIN	[REDACTED] hours at	\$275.00 =	
E. NGUYEN	[REDACTED] hours at	\$275.00 =	
D. KNISS	[REDACTED] hours at	\$150.00 =	
[REDACTED]	[REDACTED]	[REDACTED]	
E. MOSES	[REDACTED] hours at	\$150.00 =	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Costs Advanced and In-House Services:

[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
Total Costs:		[REDACTED]
Total Fees & Costs:		[REDACTED]



MITCHELL SILBERBERG & KNUPP LLP
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.
350 Fifth Avenue
New York, NY 10118
Ebill through CounselGo

Atty No.: 00750
Client ID: 50744-00009
Invoice: 457008

October 10, 2022

REMITTANCE
(please include with payment)

Current Fees:

Current Disbursements:

Total Current Charges - This Invoice:



Please remit to:

Mitchell Silberberg & Knupp LLP
2049 Century Park East, 18th Floor
Los Angeles, CA 90067

Wire/ACH Transfer Instructions:

Routing Number or ABA: 121000248
Bank Name: Wells Fargo Bank, N.A.
Bank Address: 420 Montgomery, San Francisco, CA 94104
Beneficiary Account No.: 4159349430
Beneficiary Account Name: Mitchell Silberberg & Knupp LLP
For International Transfers for payments in USD: Swift BIC WFBIUS6S
For International Transfers for payments in currencies other than USD: Swift BIC WFBIUS6WFFX
For payment inquiries please e-mail payment@msk.com

*** Please Include Invoice Number with Payment ***

Note that MSK will not change its banking information without prior notice on our bills. All MSK emails originate from a [3 initials]@msk.com address. Phishing and fraud attempts are common, especially those requesting that you send payment to a new account that does not match our bills. Please don't hesitate to call if you ever have any doubt about the authenticity of any communication.